

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Petition of DALIA
GENGER, as Trustee of the Orly Genger 1993
Trust Established on Dec.13, 1993 by Arie
Genger, grantor.

SDNY Case No. 19-cv-9365 (UA)

Dalia Genger, trustee of The Orly Genger 1993
Trust,

Petitioner,

- against -

Orly Genger, Arie Genger, Glenclova Investment
Company, TR Investors, LLC, New TR Equity I,
LLC, New TR Equity II, LLC, Trans-Resources,
Inc., Arnold Broser, David Broser, John Does 1-
20, and Jane Does 1-20,

Respondents.

N.Y. Cty. Surrogate's Court File
No.: 2008-0017/E

STATEMENT UPON REMOVAL

Pursuant to Rule 9027(e)(3), The Orly Genger 1993 Trust does not consent to
entry of final orders or judgment by a United States Bankruptcy Judge.

The Orly Genger 1993 Trust will file a motion to remand this matter to
Surrogate's Court and will oppose any motion to transfer to the Western District of Texas.

Dated: October 22, 2019
New York, NY

Respectfully submitted,

POLLOCK COHEN LLP

By: /s/ Adam Pollock
Adam Pollock
60 Broad St., 24th Fl.
New York, NY 10004
(212) 337-5361
Adam@PollockCohen.com
*Attorneys for The Orly Genger 1993 Trust,
through Michael Oldner, Trustee*

To (via USPS First Class Mail):

Andrew R. Kurland, Esq.
Michael Paul Bowen, Esq.
Kasowitz Benson Torres LLP
1633 Broadway
New York, NY 10019
Counsel to the Bankruptcy Trustee

John Dellaportas, Esq.
Emmet Marvin & Martin LLP
120 Broadway, 32nd Floor
New York, NY 10271
Counsel to Sagi Genger 1993 Trust & Sagi Genger

Steven Riker, Esq.
Law Office of Steven Riker
One Grand Central Place, 46th Floor
New York, NY 10165
Guardian Ad Litem

Chris Gartman, Esq.
Hughes Hubbard & Reed LLP
One Battery Park Plaza, 16th Floor
New York, NY 10004
Counsel to Arnold Broser and David Broser

Natalie Bedoya McGinn, Esq.
Gerald Greenberg, Esq.
Gelber Schachter & Greenberg, P.A.
1221 Brickell Avenue, Suite 2010
Miami, FL 33131
Counsel to Arie Genger

John Boyle, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square
New York, NY 10036
*Counsel to Glenclova Investment Company, TR Investors, LLC,
New TR Equity I, LLC, New TR Equity II, LLC, Trans-Resources, Inc.*